## REMARKS

Claims 20-27 were previously withdrawn. Further, of claims 1-19 which were therefore at issue:

1. Claims 1-7 have been allowed;

2. Claims 18-19 have been indicated to contain allowable subject matter (and claim 18, from which claim 19 depends, has been rewritten in independent form herein);

3. Claim 12 has been canceled herein; and

4. Remaining claims 8-11 and 13-17 have been variously rejected under 35 U.S.C. § 102 as anticipated by both Kochsiek *et al.* U.S. Patent No. 4,014,439 and Crivellin U.S. Patent No. 5,197,836.

The subject matter of canceled claim 12 has been incorporated in independent claim 8.[1]

It is respectfully submitted that neither reference cited against claim 12 teaches or even remotely suggests the structure of new claim 8. Specifically, claim 8 (which now includes claim 12) now recites the two carrier structure including, *inter alia*, external gear teeth on the second carrier, a ring gear engaging the external gear teeth on said second carrier, and drives for selectively rotating the first carrier and selectively rotating the ring gear.

It is respectfully submitted that, contrary to the assertion in the Office Action, no such ring gear drive structure is shown or suggested in either Kochsiek *et al.* or

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[1]Since claim 12 has been incorporated into claim 8, Fedeli U.S. Patent No. 6,600,250 and German 199 38 058 are not addressed herein, inasmuch as both were cited only against claims 8-11, and not against claim 12.

Crivellin. Rather, in Kochsiek *et al.*, the two drums 3, 4 are driven by simple drive pinions 11, 14 (see Fig. 3). In Crivellin, the carriers 19, 22 are similarly driven by worm screws 25, 29 (see Figs. 2-3). Neither reference discloses a ring gear such as disclosed (see ring gear 82 engaging gear 80 in Figs. 3-4 and 6 of the present application) and recited in claim 8. It should be appreciated that, for example, the claimed drive structure facilitates reliable equal rates of rotation for moving the tool holder in a circle (as recited in claim 13), whereas accomplishing such operation where two separate pinion or worm screw drives are required to operate at exactly the same rate may be exceedingly difficult. Accordingly, claims 8-11 and 13-17 are submitted to be allowable.

In view of the above, all of claims 1-11 and 13-19 are submitted to be allowable. Early notification to that effect is respectfully requested.

Respectfully submitted,

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